

**IN THE  
UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION**

**DEFENDANT'S MOTION FOR DOWNWARD DEPARTURE OR VARIANCE**

**COMES NOW** the defendant by counsel, and moves this Honorable pursuant to 18 U.S.C. Section 3553 to grant a variance and/or downward departure from her recommended sentencing guidelines. As grounds for said motion, defendant incorporates by reference the grounds and arguments set forth in her sentencing memorandum and also the evidence she will present at her sentencing scheduled for April 20, 2021 or at any subsequent date.

WHEREFORE, for all the foregoing reasons, defendant Nancy Degollado, respectfully prays that the court grants her motion for a variance and/or downward departure in sentencing be granted.

**NANCY DEGOLLADO**

**BY: STEPHEN R. WILLS**  
**Counsel for Defendant**

Certificate of Service

I hereby certify that I electronically filed this Motion this 20th day of April 2021 with the Clerk of Court using the CM-ECMF system, which will electronically notice all counsel of record and constitute service of such motion to counsel of record for the government.

/s/ Stephen R. Wills  
Counsel of Record for Defendant